

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JANE DOE,	:	CASE NO.: 2:20-cv-00459
	:	
Plaintiff,	:	JUDGE GRAHAM
	:	
vs.	:	MAGISTRATE JUDGE LITKOVITZ
	:	
ANDREW K. MITCHELL, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**UNOPPOSED MOTION FOR LEAVE TO DEPOSE DEFENDANT ANDREW K.
MITCHELL**

Now comes the Plaintiff, by and through her respective counsel, and request that this Court grant Leave for Plaintiff's counsel to depose Defendant Andrew K. Mitchell, pursuant to Fed.R.Civ.P. 30(b), as Defendant Andrew K. Mitchell is currently incarcerated. The grounds in support of this Motion are set forth in the Memorandum in Support, attached hereto and incorporated herein.

Respectfully submitted,

/s/ David A. Goldstein
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Attorney for Plaintiff

MEMORANDUM IN SUPPORT

Plaintiff's counsel respectfully requests this Honorable Court grant Leave pursuant to Fed.R.Civ.P. 30(b), in order for Plaintiff's counsel to depose Defendant Andrew K. Mitchell. As of November 29, 2021, Defendant Andrew K. Mitchell is incarcerated at the Butler County Jail, located at 705 Hanover Street, Hamilton, Ohio 45011. Plaintiff's counsel requests Leave to take Defendant Andrew K. Mitchell's deposition on January 27, 2022, in person. All Parties have agreed that an in-person deposition of Defendant Andrew K. Mitchell on January 27, 2022, is acceptable. This will be Defendant Andrew K. Mitchell's first deposition in this case. This Motion is unopposed by all Parties.

For all of the foregoing reasons, Plaintiff's counsel respectfully requests that this Honorable Court grant Leave pursuant to Fed.R.Civ.P. 30(b), in order for Plaintiff's counsel to depose Defendant Andrew K. Mitchell on January 27, 2022.

Respectfully submitted,

/s/ David A. Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been sent via Electronic Mail this 8th day of December 2021 to **Scott C. Walker, Esq.**, Attorney for Defendant Andrew K. Mitchell, at Walker Novack Legal Group, LLC, 5013 Pine Creek Drive, Westerville, Ohio 43081, tom@walkernovack.com, **Thomas J. Novack, Esq.**, Attorney for Defendant Andrew K. Mitchell, at Walker Novack Legal Group, LLC, 5013 Pine Creek Drive, Westerville, Ohio 43081, scott@walkernovack.com, **Janet R. Hill Arbogast, Esq.**, Attorney for Defendant City of Columbus, at City of Columbus, Department of Law, 77 North Front Street, 4th Floor, Columbus, Ohio 43215, jrhillarbogast@columbus.gov, and, **Joseph M. Gibson, Esq.**, Attorney for Defendant City of Columbus, at City of Columbus, Department of Law, 77 North Front Street, 4th Floor, Columbus, Ohio 43215, jmgibson@columbus.gov.

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